EXHIBIT G

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June 28, 2023

<u>**CONFIDENTIAL**</u>

<u>**VIA ELECTRONIC MAIL**</u>

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Re: *In re: Google Digital Advertising Antitrust Litigation*, **No. 1:21-md-03010 (PKC)**

Dear Members of the Discovery Steering Committee:

I write to follow up on several items discussed during the meet and confers held on June 8 and 16, 2023, and your letters of June 15 and 22, 2023, regarding Google's Responses and Objections to Plaintiffs' First Set of Requests for Production of Documents (the "Requests"). We will respond separately to your letter dated June 23, 2023.

Impact of JPML Issuing Stay

As discussed on the June 16 meet and confer, given that the Judicial Panel on Multidistrict Litigation has administratively stayed the transfer of State Plaintiffs' case, for now the parties remain bound by the discovery schedule and orders that Judge Castel has issued. Google therefore

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intends to proceed with taking discovery from State Plaintiffs under that schedule and those orders. State Plaintiffs confirmed that they share that understanding.

Plaintiffs' Questions Regarding Google's Productions[1]

On May 30, 2023, in advance of the substantial completion deadline, Google produced over a million documents (on top of the approximately 2.25 million documents made available to Plaintiffs earlier), approximately 800,000 of which were previously produced to the Department of Justice and over 300,000 of which were not previously produced. Google has since produced more than 200,000 additional documents.

On June 8, Plaintiffs asked whether the production volume containing the approximately 800,000 Department of Justice documents was complete and why it was divided into numerous separate sub-volumes. We confirm that the volume (PROD0013) containing the approximately 800,000 Department of Justice documents is complete and that Google did not remove from that volume any documents previously produced to the Department of Justice, other than those that were subsequently clawed back.[2]

Plaintiffs also asked about the origin of the production volumes that housed the remainder of the May 30 production. The remaining volumes (PROD0014 through PROD0016) are documents reviewed and produced in connection with the discovery proposal set forth in Google's February 27, 2023 letter. We are continuing to review documents and will make additional rolling productions.

Search Terms

On February 27, 2023, Google provided a comprehensive discovery proposal with its Responses and Objections. Google proposed to run 80 broad search strings over the files of 119 custodians across a period of ten years, resulting in a review population of more than two million documents which Google has been reviewing since February. From this review population, Google has already produced over 500,000 documents. These documents are in addition to the over two million documents that Google produced in early 2022 and the approximately 800,000 documents from the DOJ investigation that Google also produced on May 30, 2023.

Almost five weeks after Google sent its discovery proposal, Plaintiffs provided a counterproposal comprising 188 proposed new search strings that would have added an additional eight million documents to the potential review population (before deduplication). Since then, the

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[1] We have received your June 26 email regarding duplicate Bates numbers in Google's productions. We are looking into the questions you raised.

[2] The non-sequential nature of the sub-volumes does not indicate that documents were withheld. Rather, it is the result of reproducing a set of documents that had previously been subject to clawbacks and throwbacks. Re-running all sub-volumes as one production folder is unnecessary and would have significantly increased the processing time.

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parties have engaged in four meet and confers regarding search terms and Google agreed to 92 of Plaintiffs' proposed search strings. Google also agreed to give Plaintiffs the benefit of the 23 additional search strings to which Google had agreed in the Eastern District of Virginia case.[3] Plaintiffs have since withdrawn 33 search strings but added 11 more.

On June 5, we provided revised hit counts for the search terms that were still in dispute as of that day. As we have explained, due to the sheer volume of the documents involved, the fact that more data is constantly being loaded, and the complexity and number of searches, it took 17 days to provide hit counts. On June 13 you asked us to provide hit counts for 27 revised strings (one of which contained seven sub-parts) and 9 new strings.[4]

We provided you with our third round of hit counts on June 23. Google now agrees to another 11 of Plaintiffs' proposed search strings,[5] bringing the total number of agreed strings to more than 200. As we have told you several times, repeatedly running these search terms is a labor-intensive and time consuming manual process in light of the amount of data that has recently been ingested.

The parties now need to settle on an efficient way of resolving any outstanding disputes. Google has previously suggested that Plaintiffs can select additional search strings totaling up to an allocation of 100,000 documents and we ask that Plaintiffs now do so. In addition to being efficient, this proposal balances Plaintiffs' interest in applying their most important search strings with Google's interest in reaching a final corpus of documents that is reasonable, proportionate, not unduly burdensome, and that does not continue to balloon based on the growing demands of particular subsets of Plaintiffs.

We understand that Plaintiffs are not opposed, in principle, to Google's proposal, but believe that it is premature and have expressed concerns about its scope. In response to concerns identified in your June 15 letter, Google will exclude from the allocation of 100,000, documents from (1) centrally stored non-custodial locations, and (2) custodians other than the original 119 custodians identified in Google's February 27, 2023 letter.[6]

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[3] One of these strings is identical to Plaintiffs' proposed string 186.

[4] The nine additional search strings are new proposals from Inform, Inc. ("Inform"), notwithstanding Plaintiffs' position that Inform is "within the scope of Plaintiffs' initial set of [301] RFPs" served on January 27, 2023. *See* June 13, 2023 email from W. Noss to R. McCallum and E. Brandon.

[5] Google agrees to run proposed strings 31, 48, 51, 59, 79, 122, 160, 176, 197, and 199 as reflected in Column N of the hit counts sent on June 23. In place of proposed string 142, Google agrees to Plaintiffs' proposal to instead run proposed strings 142(a) through 142(g).

[6] To mitigate concerns previously raised by Plaintiffs, on June 7 Google agreed to measure Plaintiffs' allocation post-promotion and de-duplication. To the extent Plaintiffs' selected terms yield less than 100,000 documents post-promotion, Plaintiffs would be entitled to select additional terms for promotion if necessary, until the total additional documents promoted reaches 100,000.

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Custodians

In Google's letter to Plaintiffs' Discovery Steering Committee dated June 7, as well as at the June 8 meet and confer, we requested that Plaintiffs provide Google with a final list of proposed additional custodians on behalf of *all* Plaintiffs. Instead, on June 12, Plaintiffs provided yet another counterproposal which makes no effort to speak with "one voice" with respect to their custodian requests, *see* Sept. 24, 2021 Tr. 33:2, but instead adds another 13 custodians.

To make matters worse, Plaintiffs offered no explanation as to why this additional round of proposed custodians are relevant (much less reasonable and proportionate) or why six of them should be treated as "priorities."[7] Plaintiffs have now presented Google with four separate sets of "priority" custodians: two successive sets of "priority" custodians that are "common" to all Plaintiffs,[8] another set of "priority" custodians for Newspaper Plaintiffs and Daily Mail, and another set of "priority" custodians for Inform.

It is the responsibility of the Plaintiffs' Discovery Steering Committee to ensure that each group of Plaintiffs has their priorities adequately represented in *common* requests to Google. It is not Google's responsibility to sift through piecemeal requests.

Despite Plaintiffs' disjointed and piecemeal approach, Google has analyzed Plaintiffs' various proposed "priority" custodians. For current employees, Google was able to identify these proposed custodians' reporting lines (i.e., their manager hierarchy), but Google does not maintain that information for former employees, or prior reporting lines for current employees, in readily accessible form. Where relevant reporting line information was not available, we considered the extent to which the proposed "priority" custodians were likely to be duplicative of existing custodians. Although under no obligation to do so, we summarize this additional information in Appendix A.

As we have explained to you, the addition of each incremental custodian and the collection of their documents is a burdensome process. In addition to the comprehensive proposal of 119 custodians Google made on February 27, 2023, Google has now agreed to add 18 custodians.[9]

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[7] Plaintiffs' June 12 proposal tacks on a separate table at the end of their existing proposal titled "Inform Plaintiff Proposed Custodians." Besides omitting any explanation for the new Inform "priority" custodians, as addressed below the new table requests documents going back an extra year—again with no explanation of relevance.

[8] As Google raised in its letter dated June 7, Plaintiffs never offered an explanation as to why the second set of "priority" custodians "common" to all Plaintiffs were not initially identified as "priorities," nor why they suddenly became "priorities."

[9] In addition to the 16 custodians previously discussed, Google is adding ███████████████████████ as custodians. On top of those 18 custodians, Google is also adding 16 successor-custodians to the original 119 for the limited period of October 2020 - March 2023.

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In the interest of bringing these negotiations to a close and avoiding "delay and volume for the sake of a lodestar," May 16, 2023 Tr. at 29:13-15, Google is willing to add 10 of Plaintiffs' priority custodians (excluding senior executives). For the avoidance of doubt, and without waiving any objections, including our PTO-3 objection,[10] we expect the Discovery Steering Committee to discharge its duty and ensure that all Plaintiff groups—including the Daily Mail, Newspaper Plaintiffs, Inform, and Gannett—are represented in the decision of which 10 custodians to add.

Centrally Stored Files

Your letter of June 22 incorrectly states that our June 7 letter "mentions five non-custodial locations from which Google will search for responsive documents." Rather than identifying five *locations* of non-custodial documents, our June 7 letter identified five *categories* of locations of non-custodial documents (not to mention the numerous centrally located sources of data that Google identified), all but one of which has multiple components. For example, searching just the first of those categories, shared/team drive folders, involved an assessment of more than 2,200 share drives to determine, in good faith, those which might contain responsive documents. Google is collecting more than 1,500 of those drive folders and is applying agreed-upon search terms to that vast collection of non-custodial documents.

Your letter of June 22 also incorrectly assumes that various email addresses point to locations containing centrally stored documents. The 17 examples that you list on pages 4 and 5 of your letter are in fact email aliases that do not lead to repositories of centrally stored documents.

To the extent your June 22 letter refers to centrally stored files related to Ariane documents, as you know, Google already undertook an extensive and burdensome search for Ariane-related documents as part of the DOJ's pre-suit investigation. Plaintiffs received the benefit of that search on May 30, when Google produced approximately 40,000 documents sourced from Ariane. In addition, Google has already conditionally agreed to add 8 custodians who are likely to have Ariane-related documents so long as doing so does not yield an unreasonable number of documents.[11]

Your June 22 letter also references various "goto/" and "go/" links and suggests that these also likely point to repositories of centrally-stored materials. That is incorrect. A goto/ or go/ link is a link that can redirect to any URL address, including documents already found in custodial files that are being collected and reviewed. To the extent that Plaintiffs seek linked documents, they may make reasonable and proportionate requests for them under the governing ESI Order.

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[10] Plaintiffs' June 15 letter declared an impasse as to PTO-3. As we explained on our meet and confer the next day, we are not at an impasse because Google has never refused to consider search terms concerning non-common issues. And Plaintiffs may propose additional non-common search terms as part of the 100,000 search hit allocation described above.

[11] Those 8 custodians are: ███████████████████████████████████
███████████████

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The misapprehensions in your June 22 letter provide further support for Google's position that Google—as the responding party—is in the best position to identify and search appropriate locations for potentially responsive documents. Although under no obligation to do so, Google will further consider Plaintiffs' various "concerns" regarding the scope of Google's searches (including as to RASTA) and respond in due course.[12]

Source Code

We do not understand—and you have not provided any explanation for—your "disagree[ment]" regarding "Google's search capabilities, particularly regarding [Google]'s ability to search its own code" as set forth in your June 8 email. Your objections particularly lack merit given you have not yet reviewed the code Google will make available. Your email glosses over the fact that Google will be making available source code for Dynamic Allocation, Enhanced Dynamic Allocation, Reserve Price Optimization, Dynamic Revenue Share, Minimum Bid to Win aka Highest Other Bid, Poirot, Bernanke (including Global Bernanke and Bell), Elmo, Exchange Bidding, Line Item Caps, and Unified Pricing Rules, to the extent that it exists and can be located from a reasonable search. Consistent with its obligations, Google will make the source code available for inspection "in a format allowing it to be reasonably reviewed and searched." ECF No. 203, App. C ¶ 10. The source code made available to Plaintiffs will include comments in the code. We anticipate making the source code available for inspection at the New York offices of Axinn, Veltrop & Harkrider LLP (114 W 47th St, New York, NY 10036) the week of July 17, 2023.

In response to your question relating to version control, Google will also be making available information sufficient to identify changes to the code for the above-referenced products or features since January 1, 2013, with the exception of changes to the code for Dynamic Allocation, for which Google will provide since January 1, 2009.

Time Period

We received your request to extend the time period for 2 custodians and 3 search strings that Google has already agreed to run beginning on January 1, 2013, and for another 10 search strings and 13 custodians that remain in dispute.[13] During our meet and confers, we noted that extending the time period for custodians is significantly less burdensome than extending the time period for search terms, because extending even a single search term means that all custodians'

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[12] On the June 16 meet and confer Plaintiffs asked about the exclusion of application developer kit file types described in Google's June 7 letter. An application developer kit file (an .apk file) is an executable file format used by Android to install and distribute apps. Exclusion of application developer kit file types does not result in the exclusion of other file types (e.g., Google docs, PDFs, Word docs) that describe how applications operate. In addition, as described below, Google is already conducting a separate collection of source code related to the claims at issue in these cases.

[13] Of the disputed items for which Plaintiffs sought to extend the time period, all but one of the search strings and all of the custodians are driven by Inform's proposals.

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documents must be collected back to the beginning of the extended time period. As a result, on June 23, Plaintiffs agreed to drop their request to extend the time period for search terms. Google conditionally agrees to extend the time period for ████████████████████ back to January 1, 2009, as long as doing so does not yield an unreasonable number of documents.

We understand that the parties have resolved all outstanding disputes as to the relevant time period, other than Inform's request that the relevant period for its proposed custodians begin on January 1, 2012 rather than January 1, 2013. To the extent the Discovery Steering Committee selects any of Inform's proposed custodians as part of Plaintiffs' allocation of 10 additional custodians, Google agrees to extend the time period for those custodians back to January 1, 2012, as long as doing so does not yield an unreasonable number of documents.

YouTube

In our June 7 letter and during the June 8 meet and confer, we invited Plaintiffs to propose terms related to YouTube. Plaintiffs' June 13 search terms counterproposal contains three search strings that reference YouTube, two of which have been newly proposed by Inform. Plaintiffs may elect to include those search strings in Google's proposed allocation.[14]

Inform[15]

We sought to confirm at the June 8 meet and confer that—now that discovery is no longer stayed as to Inform—Plaintiffs' 301 purportedly common RFPs would similarly be common to Inform. Inform's counsel told us that if Inform had been a part of discovery at that time, there would have been 305 or 310 "common" requests. Not only does this indicate that Inform may make additional, non-common requests, but counsel appeared to confirm that, as Google has long suspected, the 301 Requests Plaintiffs promulgated are not, in fact, all common to all Plaintiffs.

Further confirming these suspicions, Inform has now proposed nine new search strings and 13 new custodians. Even though these Requests and proposals appear to be non-common for purposes of PTO-3, without waiving any PTO-3 objections Google agrees to two of the nine

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[14] As noted in our June 7 letter and on our June 8 meet and confer, Google does not consider the YouTube investigation terms to be a useful basis for search term negotiations because they do not relate to Plaintiffs' YouTube Request (Request 28(g)). On our June 8 meet and confer, we nonetheless provided the search string numbers from which YouTube was removed. Plaintiffs requested that we provide a redline of where in the strings YouTube had appeared. In a good faith effort to progress these discussions, Google is providing this information in Appendix B. We do not understand your invocation of the Coordination Order, ECF No. 564, in your June 15 letter. Google also removed YouTube investigation search terms from the search terms used in the Eastern District of Virginia, to which the Department of Justice made no objection.

[15] Please provide whitelisting credentials so that Inform can receive prior and forthcoming productions. Alternatively, because counsel for Inform already has access to those documents by virtue of its representation of other plaintiffs, counsel for Inform may provide those productions to Inform.

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proposed search strings—proposed strings 197 and 199. Google anticipates that the remaining disputed issues can be resolved by Google's allocation proposal.

Gannett

On June 22, 2023, Judge Castel accepted as related to this MDL the newly filed *Gannett Co. v. Google LLC et al.*, Case No. 1:23-cv-5177 (PKC) (S.D.N.Y.). Gannett "is subject to all existing and future Orders and Schedules of this Court entered in the MDL." ECF No. 574 at 1. As a result, Google will make all prior and forthcoming discovery available to Gannett on the same basis as all other Plaintiffs.[16] Moreover, as with all other plaintiffs, Google's allocation proposal applies to Gannett. To the extent Plaintiffs contend that Gannett warrants discovery over and above the existing 301 Requests, please explain how Gannet's claims diverge from the claims already brought by other plaintiffs and how that divergence warrants additional discovery.

Transcripts

Plaintiffs' letter of June 13, 2023 requested production of a "copy of all transcripts of sworn statements, depositions, or interviews conducted in relation to any investigation or inquiry" for which Google produced Documents in response to Request 274. Your letter noted that Google has not produced any documents responsive to this Request. But Google objected in full to the bulk of Request 276 and "agree[d] to meet and meet and confer regarding relevant transcripts from the pre-suit investigation in *United States v. Google LLC*, No. 1:23-cv-00108 (E.D. Va.)." And Plaintiffs never took Google up on that offer, made over four months ago.

Moreover, Plaintiffs have recently argued that not all material from the pre-suit investigation is relevant here because not all of it relates to ad tech.[17] Nonetheless, in the interests of responsibly bringing these negotiations to an end, Google agrees to produce transcripts from the pre-suit investigation in *United States v. Google LLC*, No. 1:23-cv-00108 (E.D. Va.) to the extent they implicate the claims or defenses in this case. Google is in the process of reviewing transcripts and will promptly produce those that are relevant.

Third Party Productions

With respect to Plaintiffs' recent request for the production of documents responsive to third party subpoenas issued in the parallel proceedings in the Eastern District of Virginia (and

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[16] Please provide whitelisting credentials so that Gannett can receive prior and forthcoming productions. Alternatively, because counsel for Gannett already has access to those documents by virtue of its representation of other plaintiffs, counsel for Gannett may provide those productions to Gannett.

[17] *See, e.g.*, ECF No. 544 at 2 (attempting to minimize the over 2 million documents reproduced in early 2022 by calling out the "approximately two-thirds of [documents] produced in connection with a separate Google search investigation"); May 17, 2023 Email from Z. DeRose to R. McCallum (same); May 11, 2023 Letter to Google Regarding Documents Produced (same).

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associated communications), Google has no objection in principle to producing such documents provided that Plaintiffs also agree to a timely and reciprocal production of subpoena-related communications.   Google recently served Request for Production 45 seeking "[a]ll communications between You and any non-party, including but not limited to recipients of subpoenas or voluntary requests for production, concerning the Investigation or the subject matter of this Action." Among other things, Request 45 is intended to require production of Plaintiffs' communications with third parties that it has subpoenaed in this MDL. We are available to meet and confer regarding the parameters of reciprocal production of these documents.

* * *

These discovery negotiations have gone on for too long. From the outset, Google formulated a comprehensive discovery proposal that Plaintiffs have yet to credibly challenge. Google has entertained and accommodated multiple rounds of negotiations regarding search terms, and has already agreed to search more than a reasonable and proportionate universe of documents to identify material that Plaintiffs contend might be responsive to their 301 Requests for Production.[18]

We maintain that Plaintiffs' Discovery Steering Committee has failed to discharge the responsibilities entrusted to it by the Court. Rather than speaking with "one voice" as directed by the Court, the collective MDL Plaintiffs insist on approaching discovery with a piecemeal, scattershot approach which the Discovery Steering Committee has failed to rein in or correct.

Best regards,

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[18] We do not understand the assertion in your June 15 letter that the purpose of demanding an in-person meet and confer was to ensure that Google would have "a decision-maker present so that we could make real progress." The same team and decision-makers that have joined virtual meet and confers also joined the in-person meet and confer. We maintain that Plaintiffs' demands for an in-person meet and confer were wasteful and unnecessary.

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Appendix A

Plaintiffs' First Set of Common Priority Custodians

Name	Job Title	Reporting Line & Overlap with Existing Custodians
███████████	Senior Staff Software Engineer	████ entire reporting line are already existing custodians: ████████████████████████████████ Sundar Pichai.
███████████	VP, Engineering	████████ entire reporting line are already existing custodians: ███████████████████ Sundar Pichai.
██████████	Director, Software Engineering	████ entire reporting line, with the exception of his direct supervisor, are already existing custodians: ████ ████████████████████ Sundar Pichai.
██████████████	Sales Operations Senior Associate III	████████ is a former Google employee and so reporting line information is not readily accessible. As explained at our May 18 meet and confer, however, his inclusion would be duplicative and disproportionate because existing custodians such as ███████████████████████ ████████████████████████, among others, can speak to header bidding issues.
██████████████	Director, Product Management	The senior members of ██████ reporting line are already existing custodians: ██████████████████████████ ███ Sundar Pichai.
██████████	SVP, Finance	████ reports directly to Sundar Pichai, who is already a custodian. Moreover, given ██████ role as a senior executive at the Company she is unlikely to have unique responsive documents beyond those already contained in the files of existing custodians. In particular, Google has already agreed to add the Display Ads Finance Director, ████████████, as a custodian.
█████████████	Director, Global Communications	Because the communications department is far removed from the core conduct alleged in this case, ██████████ managers are not existing custodians. As explained at our May 18 meet and confer, however, her inclusion would be duplicative and disproportionate because to the extent she handled communications related to ad tech, that information would have come from the over 130 ad tech custodians Plaintiffs already have.

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Plaintiffs' Second Set of Common Priority Custodians

Name	Job Title	Reporting Line & Overlap with Existing Custodians
███████████	Director, Global Communications	Because the communications department is far removed from the core conduct alleged in this case, ██████ managers are not existing custodians. As explained at our May 18 meet and confer, however, her inclusion would be duplicative and disproportionate because to the extent she handled communications related to ad tech, that information would have come from the over 130 ad tech custodians Plaintiffs already have.
██████	Principal Scientist	██████ entire reporting line, with the exception of his direct supervisor, are already covered by existing custodians: ██████████████████ ███████████ Sundar Pichai.
█████	Staff Solutions Consultant	███ works in an unrelated area of Google's business now so his current reporting line information is not relevant. However, his inclusion would be duplicative and disproportionate. Existing custodians ████████████ ███████████████████████, among others, cover sell-side tools and programs.
███████	DNU - Director, Technical Solutions Consultant	████████ is a former Google employee and so reporting line information is not readily available. However, his inclusion would be duplicative and disproportionate. Existing custodians such as ████████████ ████████████████████████, among others, can speak to header bidding. Further, ███████████ specifically covers the buy-side.
████████	DNU - Mgr, Software Engineering III	████████ is a former Google employee and so reporting line information is not readily available. However, her inclusion would be duplicative and disproportionate. Existing custodians like ████████████ ████████ among others, can speak to DA/EDA. ███ █, who we have conditionally agreed to add, can also speak to DA/EDA. Scott Spencer ██████████ ██████████ cover issues related to DFP-AdX integration.
██████	Staff Data Scientist	███ works in an unrelated area of Google's business now so his current reporting line information is not relevant. However, his inclusion would be duplicative and disproportionate. Existing custodians like ████████ and ███████k, among others, can speak to DA/EDA. ███████, who we have conditionally agreed to add, can also speak to DA/EDA.

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Newspaper/Daily Mail Priority Custodians

Name	Job Title	Reporting Line & Overlap with Existing Custodians
████	Director, Sales	Three of the four members of █████████ reporting line are already custodians: ███████ Philipp Schindler, and Sundar Pichai.
████	Senior Strategic Partnerships Development Manager	The senior members of ████ reporting line are existing custodians: ████████ Philipp Schindler, and Sundar Pichai.
████	Director, Partnerships	█████ entire reporting line are already custodians: ████████ Philipp Schindler, and Sundar Pichai.
████	Senior Strategic Partnerships Development Manager	The majority of ███ reporting line are already custodians: ██████████ Philipp Schindler, and Sundar Pichai.
██████	Head of Global Partnerships, News and Publishing - Top Partners	████ is a former employee so no reporting line information is readily available. However, her inclusion would be duplicative and disproportionate given that ██████████ and his reporting line (██████ Philipp Schindler, and Sundar Pichai) are already custodians. ██████████ can speak to newspaper publisher partnerships.
████████[19]	Senior Strategic Partnerships Development Manager	The majority of ██████ reporting line are already custodians: ████████████ Philipp Schindler, and Sundar Pichai.
████	Strategic Partnerships Development Sr. Associate	The senior members of █████ reporting line are already custodians: ████████ Philipp Schindler, and Sundar Pichai.

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[19] At points, Plaintiffs have placed ████ in the first set of "common priority" custodians, but Plaintiffs' latest spreadsheet indicates she is Newspaper/Daily Mail specific so we have included her in this grouping.

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Inform Priority Custodians

Name	Job Title	Reporting Line & Overlap with Existing Custodians
███████████	Partnerships Development Management III	███████ entire reporting line, with the exception of her direct supervisor, are already existing custodians: ███ ███████████████████ Philipp Schindler, and Sundar Pichai.
████████	Senior Technical Solutions Consultant	██████ is a former employee so no reporting line information is readily available. Plaintiff Inform has not yet explained his relevance to the case.
████████	TBD - pending information from Plaintiff Inform	As requested on our June 16 and June 23 meet and confers, Google is waiting on additional information from Plaintiff Inform to help identify this priority custodian.
███████	Google Cloud, Head of Customer Engineering	████ is a former employee so no reporting line information is readily available. Plaintiff Inform has not yet explained his relevance to the case.
███████	Sales Manager III	████ is a former employee so no reporting line information is readily available. Plaintiff Inform has not yet explained his relevance to the case.
███████	Partner Manager II	████ is a former employee so no reporting line information is readily available. Plaintiff Inform has not yet explained his relevance to the case.

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Appendix B

	Investigation Terms From Which YouTube Was Removed
DOJ Search String 1	("M&A" OR "M & A" OR MA OR merger* OR acquisition* OR acquir* OR transaction OR divest* OR JV OR "joint venture" OR "joint-venture" OR alliance) /20 (AdWords OR "Ad Words" OR "Google Display Network" OR GDN OR DoubleClick OR "Double Click" OR "Double-Click" OR "Bid Manager" OR DBM OR "Campaign Manager" OR DCM OR DFA OR "Ads Data Hub" OR ADH OR "DoubleClick Studio" OR "DoubleClick Search" OR "Google Analytics 360 Suite" OR GA360 OR "DoubleClick for Publishers" OR DFP OR "Ad Exchange" OR AdX OR "Ad X" OR "Google Ads" OR "Smart Campaigns" OR "Google Marketing Platform" OR "Display & Video 360" OR "Display and Video 360" OR DV360 OR "Campaign Manager" OR Studio OR "Search Ads 360" OR SA360 OR "Google Analytics" OR "Google Ad Manager" OR GAM OR AdSense OR "Ad Sense" OR AdMob OR "Ad Mob" OR DVIP OR AdMeld OR AFS OR AFC OR DRX OR "X for Publishers" OR GMP OR DV3 OR SA3 OR "X for Advertisers" OR XFA OR GCN OR "Relay Media" ~~OR YouTube OR "You Tube" OR "You-Tube" OR YT~~ OR (invite pre/3 media) OR "Advertising Exchange" OR ADXSSL OR "Ad Manager 360" OR AM360 OR AwBid)
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